

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ERB LEGAL INVESTMENTS LLC,	)	
	)	
Plaintiff and Counterclaim Defendant,	)	
	)	
v.	)	
	)	Cause No. 4:20-CV-1255
QUINTESSA MARKETING LLC,	)	
	)	
	)	
Defendant and Counterclaim Plaintiff.	)	
	)	
	)	
	)	

**MOTION FOR LEAVE TO AMEND COMPLAINT AND JOIN ADDITIONAL PARTY  
DEFENDANT**

COMES NOW Plaintiff, ERB LEGAL INVESTMENTS LLC, by and through attorney E. Ryan Bradley of The Bradley Law Firm and pursuant to Fed R. Civ. P. 15 for leave to file an Amended Complaint and pursuant to Fed R. Civ. P. 19, or in the alternative Fed R. Civ. P. 20, add additional party defendants and in support thereof states as follows:

1. Under the current scheduling order, Plaintiff was afforded time to file an Amended Complaint on or before March 16, 2021.
2. Lauren Mingee was Defendant Quintessa Marketing, LLC's sole owner and Plaintiff seeks to add her as a party Defendant pursuant to FRCP 19 as a required party whose absence from this case would result in incomplete relief to Plaintiff and disposing of this action in her absence would impair and/or impeded Plaintiff's ability to obtain full and complete relief. In the alternative, Plaintiff seeks to add Lauren Mingee under FRCP 20 on the basis that

Plaintiff's right to relief is asserted against her jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, or series of transactions or occurrences and common questions of law and fact are common to all defendants as more fully set forth in **Exhibit 1**, the proposed Amended Complaint, whose contents of which are incorporated herein by reference as the basis for adding Mingee to this cause of action.

3. That no party to this matter will be prejudiced by the amending of Plaintiff's Complaint or adding this defendant.

4. That it is in the interest of justice to allow Plaintiff to amend its Complaint and add Lauren Mingee as a party defendant.

5. Plaintiff's proposed Second Amended Complaint is attached hereto as **Exhibit 1**.

**WHEREFORE**, Plaintiff respectfully requests this Court SUSTAIN Plaintiff's Motion and deem Plaintiff's proposed Second Amended Complaint FILED instant and for any such other and further relief as this Court deems appropriate under the circumstances.

Respectfully submitted,

/s/ E. Ryan Bradley

By: \_\_\_\_\_

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**PAGE LAW**

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 27, 2021, I electronically filed the foregoing Certificate of Service with the Clerk of the Court using the **Missouri Courts E-Filing System** which was sent notification of such filing to all counsel of record. I further certify that I signed, or caused my electronic signature to be placed upon the original of the foregoing documents and that a copy of the foregoing was sent via the Court's e-filing system to.

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/s/E. Ryan Bradley